

REMARKS

Applicant respectfully requests further examination and reconsideration in view of the instant amendment and response. Claims 1-40 remain pending in the case. Claims 1-40 are rejected. New Claims 41 and 42 have been added herein. No new matter has been added.

35 U.S.C. §103(a) - Claims 1, 2, 5-10, 13-18 and 21-23

Claims 1, 2, 5-10, 13-18 and 21-23 are rejected under 35 U.S.C. § 103(a) as being unpatentable over United States Patent 6,239,466 by Zondag, hereinafter the "Zondag" reference, in view of United States Patent 6,118,774 by Sturgeon et al., hereinafter the "Sturgeon" reference. Applicant has reviewed the cited references and respectfully submit that the present invention as recited in Claims 1, 2, 5-10, 13-18 and 21-23 is not anticipated nor rendered obvious by Zondag in view of Sturgeon.

Applicant respectfully directs the Examiner to independent Claim 1 that recites that an embodiment of the present invention is directed to (emphasis added):

A method of operating a plurality of types of consumer electronic devices interconnected to form a network, said method comprising:

configuring a resource manager of said network with an access policy during network initialization wherein said access policy dictates a condition under which a particular service request is permissible to a user;

receiving a service request indicating an identity of a user;

based on said identity, said resource manager determining whether said service request violates said access policy;

provided said service request is permissible, said resource manager determining whether resources of said network necessary for carrying out said service request are available; and

provided said resources necessary for carrying out said service request are available, said resource manager transmitting control signals to said network causing said plurality of types of consumer electronic devices to carry out said service request.

Independent Claims 9 and 17 recite a similar limitation. Claims 2 and 5-8 that depend from independent Claim 1, Claims 10 and 13-16 that depend on independent Claim 9, and Claims 18 and 21-23 that depend from independent Claim 17 provide further recitations of the features of the present invention.

Zondag and the claimed invention are very different. Applicant understands Zondag to teach a method for managing the functionality of a consumer electronics system. In effect, Zondag teaches a communication system for controlling the functionality of a controlled station. More particularly, Zondag teaches a method for managing a consumer electronic system irrespective of the identity of a particular user and without considering an access policy for dictating user access to a particular service request.

Zondag does not anticipate the claimed embodiments of the invention because Zondag teaches a system for managing a consumer electronic system without regard to the identity of a user. As described in the claimed embodiment of the present invention, a method is provided for "operating a

plurality of types of consumer electronic devices interconnected to form a network.” Specifically, the claimed embodiment recites the limitation “configuring a resource manager of said network with an access policy during network initialization wherein said access policy dictates a condition under which a particular service request is permissible to a user” (emphasis added).

As described in the specification, a policy statement is used to dictate conditions under which certain services can be provided to certain users (page 19, lines 20-24). Access may be granted to a particular electronic device based on the particular service request when compared to the access policy. Thus, access to a particular electronic device may or may not be granted to a particular user based on the particular service request. For example, the access policy may be structured such that a particular user may be limited to a predetermined number of hours access per day to a television, thereby limiting the user’s television viewing (page 19, line 24 through page 20, line 4. As another example, a particular user may be limited to a predetermined monetary amount of online spending per month (page 20, lines 21-22). Thus, an access policy as claimed is operable to restrict the usage of particular services depending on the user.

Furthermore, the present invention recites the claim limitations of “receiving a service request indicating an identity of a user,” and “based on said identity, said resource manager determining whether said service request

violates said access policy.” Accordingly, the identity of a user is received along with a service request, and the service manager determines whether the service request violates the access policy. In particular, the access policy used to dictate the usage of particular resources depending on the identity of a user.

Thus, the claimed embodiments provide a method for operating a plurality of consumer electronic devices based on the identity of a user. The service request of the user is weighed against the access policy, and it is determined if the access policy for the particular user is violated. As such, access to resources of the network can be monitored and controlled based on the identity of a user.

In contrast, Zondag teaches a method for managing the functionality of a consumer electronics system. Specifically, Zondag teaches a communication system where a controller station controls the functionality of a controlled station. The functionality is controlled according to an abstract representation (AR) associated with each controlled station (Abstract). An AR is defined as “an interface for software elements in the system to control the functionality of the controlled station by means of messages exchanged with the AR via the communications network” (col. 1, lines 10-13). Specifically, each controlled station has an associated AR. The AR is mapped into internal control mechanisms and controls underlying the hardware/software for each controlled station (col. 1, lines 45-50). In essence, the AR provides an interface

for allowing the controller station to access the functionality of each controlled station.

Applicant understands each AR to control the interface between a controlled station and the controller station. In particular, the AR is device-dependent, and is in no way reliant on the identity of a user. Furthermore, the AR does not limit or control access to a controlled station based on the identity of a user. On the contrary, the AR is independent of a user's identity. While the AR can control the functionality of the controlled station, the functionality is not controlled based on user identity. Applicant respectfully submits that Zondag teaches a method for managing a consumer electronic system irrespective of the identity of a particular user and without considering an access policy for dictating user access to a particular service request. By teaching a method for managing a consumer electronic system that is independent of a user's identity, Zondag teaches away from the claimed invention.

Applicant respectfully submits that Zondag does not teach or suggest "a method of operating a plurality of types of consumer electronic devices interconnected to form a network" as claimed. In particular, the system as taught in Zondag does not teach or suggest configuring a resource manager with an access policy that dictates a condition under which a particular service request is permissible to a user. On the contrary, Zondag teaches a system each controlled station, rather than the controller station, has an associated

AR, where the AR is device-dependent and operates independent of the user's identity.

Moreover, the combination of Zondag and Sturgeon fails to teach or suggest the claimed embodiments because Sturgeon does not overcome the shortcomings of Zondag. Sturgeon, alone or in combination with Zondag, does not show or suggest "a method of operating a plurality of types of consumer electronic devices interconnected to form a network" as claimed. As described above, Zondag teaches a method for managing the functionality of a consumer electronics system independent of a user's identity.

Applicant understands Sturgeon to teach a parental blocking system in a DVD integrated entertainment system. In particular, Sturgeon teaches a DVD unit that establishes a list of users, and corresponding restrictions for each user. Specifically, the system of Sturgeon provides for blocking access to the content of a DVD based on existence or absence of Parental Management Information (PMI) that is resident on the DVD.

In contrast, embodiments of the claimed invention provide an access policy that is configured on a resource manager. The access policy can be configured to dictate conditions for accessing resources of the network. Specifically, the access policy is configured on the resource manager, and is used to manage access to resources over the network. Furthermore, as

described above, the access policy may be used to dictate conditions in accordance with any service request, and is not limited to parental controls (e.g., limiting online spending).

Furthermore, Applicant respectfully asserts that one skilled in the art would not be motivated to combine the teachings of Zondag and Sturgeon because Zondag teaches away from such a combination. As described above, Zondag specifically teaches a system for managing functionality of controlled stations that is independent of the identity of a user. On the contrary, Sturgeon teaches a DVD unit that operates based on the identity of a user. Zondag does not teach identifying a user. In particular, teaching a method for managing a consumer electronic system that is independent of a user's identity, Zondag teaches away from the combination of Zondag and Sturgeon.

Applicant respectfully asserts that nowhere does the combination of Zondag and Sturgeon teach, disclose or suggest the present invention as recited in independent Claims 1, 9 and 17, and that Claims 1, 9, and 17 are thus in condition for allowance. Therefore, Applicant respectfully submits that the combination of Zondag and Sturgeon also does not teach or suggest the additional claimed features of the present invention as recited in Claims 2 and 5-8 that are dependent on allowable base Claim 1, Claims 10 and 13-16 that are dependent on allowable base Claim 9, and Claims 18 and 21-23 that are dependent on allowable base Claim 17. Applicant respectfully submits that

Claims 2, 5-8, 10, 13-16, 18 and 21-23 overcome the rejection under 35 U.S.C. § 103(a) as these claims are dependent on allowable base claims.

35 U.S.C. §103(a) - Claims 3, 4, 11, 12, 19 and 20

Claims 3, 4, 11, 12, 19 and 20 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Zondag in view of Sturgeon, and further in view of United States Patent 6,311,207 by Mighdoll et al., hereinafter the "Mighdoll" reference. Claims 3, and 4 are dependent on allowable base Claim 1, Claims 11 and 12 are dependent on allowable base Claim 9, and Claims 19 and 20 are dependent on allowable base Claim 17. Applicant respectfully submits that Claims 3, 4, 11, 12, 19 and 20 overcome the cited art of record and are patentable in view of 35 U.S.C. § 103(a).

35 U.S.C. §103(a) - Claims 24-40

Claims 24-40 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Zondag in view of United States Patent 6,567,979 by deCarmo, hereinafter the "deCarmo" reference. Applicant has reviewed the cited references and respectfully submit that the present invention as recited in Claims 24-40 is not anticipated nor rendered obvious by Zondag in view of deCarmo.

Applicant respectfully directs the Examiner to independent Claim 24 that recites that an embodiment of the present invention is directed to (emphasis added):

A method of operating a network comprising consumer electronics devices, comprising the acts of:

receiving a request from a user of the network, wherein the request comprises a request for output of a media content item without the user specifying a source providing the media content item to the network and without the user specifying an electronic device of the network for the output; and

outputting the media content item if the user is permitted to receive the media content item and if an electronic device of the network is available to output the media content item.

Independent Claim 33 recites a similar limitation. Claims 25-32 that depend from independent Claim 23, and Claims 34-40 that depend on independent Claim 33 provide further recitations of the features of the present invention.

Zondag and the claimed invention are very different. As described above, Applicant understands Zondag to teach a method for managing the functionality of a consumer electronics system. In effect, Zondag teaches a communication system for controlling the functionality of a controlled station. More particularly, Zondag teaches a method for managing a consumer electronic system using ARs associated with each controlled system.

Zondag does not anticipate the claimed embodiments of the invention because Zondag teaches a system for managing a consumer electronic

system without regard to the identity of a user, and does not receive requests for media content. As described in the claimed embodiment of the present invention, a method is provided for “operating a network comprising consumer electronics devices.” Specifically, the claimed embodiment recites the limitations of “receiving a request from a user of the network, wherein the request comprises a request for output of a media content item” and “outputting the media content item if the user is permitted to receive the media content item and if an electronic device of the network is available to output the media content item” (emphasis added).

In contrast, Zondag does not teach receiving a request for output of a media content item. Zondag teaches a system that allows a controller station to control a controlled station based on an AR. This AR can be stored in a remote storage means and supplied with a controlled station by an AR allocation means. Applicant respectfully asserts that an AR is not media content. In particular, an “AR is a software element used to control a station” (col. 8, lines 66-67).

Furthermore, Zondag does not teach a system for “outputting the media content item if the user is permitted to receive the media content item,” as claimed. As described in the specification, a policy statement is used to dictate conditions under which certain services can be provided to certain users (page 19, lines 20-24). Access may be granted to a particular electronic device based

on the particular service request when compared to the access policy. Thus, access to a particular electronic device may or may not be granted to a particular user based on the particular service request. For example, the access policy may be structured such that a particular user may be limited to a predetermined number of hours access per day to a television, thereby limiting the user's television viewing (page 19, line 24 through page 20, line 4. As another example, a particular user may be limited to a predetermined monetary amount of online spending per month (page 20, lines 21-22). Thus, an access policy as claimed is operable to restrict the usage of particular services depending on the user.

Thus, the claimed embodiments provide a method for operating a plurality of consumer electronic devices based on the identity of a user. The identity of the user determines if whether the user is permitted to receive media content. As such, access to resources of the network can be monitored and controlled based on the identity of a user.

In contrast, Zondag teaches a method for managing the functionality of a consumer electronics system. Specifically, Zondag teaches a communication system where a controller station controls the functionality of a controlled station. The functionality is controlled according to an abstract representation (AR) associated with each controlled station (Abstract). An AR is defined as "an interface for software elements in the system to control the functionality of the

controlled station by means of messages exchanged with the AR via the communications network” (col. 1, lines 10-13). Specifically, each controlled station has an associated AR. The AR is mapped into internal control mechanisms and controls underlying the hardware/software for each controlled station (col. 1, lines 45-50). In essence, the AR provides an interface for allowing the controller station to access the functionality of each controlled station.

Applicant understands each AR to control the interface between a controlled station and the controller station. In particular, the AR is device-dependent, and is in no way reliant on the identity of a user. Furthermore, the AR does not limit or control access to a controlled station based on the identity of a user. On the contrary, the AR is independent of a user's identity. While the AR can control the functionality of the controlled station, the functionality is not controlled based on user identity. Applicant respectfully submits that Zondag teaches a method for managing a consumer electronic system irrespective of the identity of a particular user and without considering an access policy for dictating user access to a particular service request. By teaching a method for managing a consumer electronic system that is independent of a user's identity, Zondag teaches away from the claimed invention.

Applicant respectfully submits that Zondag does not teach or suggest “a method of operating a plurality of types of consumer electronic devices

interconnected to form a network” as claimed. In particular, the system as taught in Zondag does not teach or suggest configuring a resource manager with an access policy that dictates a condition under which a particular service request is permissible to a user. On the contrary, Zondag teaches a system each controlled station, rather than the controller station, has an associated AR, where the AR is device-dependent and operates independent of the user’s identity.

Moreover, the combination of Zondag and deMarco fails to teach or suggest the claimed embodiments because deMarco does not overcome the shortcomings of Zondag. DeMarco, alone or in combination with Zondag, does not show or suggest “a method of operating a network comprising consumer electronics devices” as claimed. As described above, Zondag teaches a method for managing the functionality of a consumer electronics system independent of a user’s identity.

Applicant understands deMarco to teach a DVD environment wherein a user specifies a source for providing the media content. Specifically, deMarco teaches a DVD environment for providing media content in response to a user specifying a particular DVD (col. 6. lines 18-39).

In contrast, embodiments of the claimed invention recite the limitation wherein “the request comprises a request for output of a media content item

without the user specifying a source providing the media content item to the network and without the user specifying an electronic device of the network for the output (emphasis added). In particular, a user does not specify the source, but rather specifies the content, such that the media content is provided without the user specifying the source or the electronic device for the output.

Applicant respectfully asserts that nowhere does the combination of Zondag and deMarco teach, disclose or suggest the present invention as recited in independent Claims 24 and 33, and that Claims 24 and 33 are thus in condition for allowance. Therefore, Applicant respectfully submits the combination of Zondag and deMarco also does not teach or suggest the additional claimed features of the present invention as recited in Claims 25-32 that are dependent on allowable base Claim 24 and Claims 34-40 that are dependent on allowable base Claim 33. Applicant respectfully submits that Claims 25-32 and 34-40 overcome the rejection under 35 U.S.C. § 103(a) as these claims are dependent on allowable base claims.

CONCLUSION

Based on the arguments presented above, Applicant respectfully asserts that Claims 1-40 overcome the rejections of record and, therefore, Applicant respectfully solicits allowance of these Claims.


Applicant has reviewed the following references which were cited but not relied upon and does not find these reference to show or suggest the present claimed invention: US 6,353,84, US 6,286,001, US 6,014,135, US 6,363,434, US 6,513,116, US 6,594,825, US 6,055,023 and US 6,292,798.

The Examiner is invited to contact Applicant's undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,

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